



23632 Mercantile Road Beachwood, Ohio 44122 • Cleveland (216) 765-8930 • Toll Free 1-800-776-8578 • Fax (216) 765-0885

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

8 January 1998

Re: Amendment of the Commission's Rules Regarding Installment Payment
Financing For Personal Communications Services (PCS) Licensees

Dear Madam Secretary:

On behalf of Cellnet of Ohio, Inc., I have enclosed ten (10) copies of "REPLY COMMENTS
TO OPPOSITION: FROM CELLNET OF OHIO, INC." in the proceeding referenced above.
You may direct any question concerning this matter to Michael Tricarichi.

Respectfully submitted,

Stephanie Savransky
Stephanie Savransky
Assistant to the President

Enclosures

cc: The Honorable Susan Ness
The Honorable Harold Furchtgott-Roth
The Honorable Michael Powell
The Honorable Gloria Tristani

No. of Copies rec'd
List A B C D E

0 + 9



The Voice Is Clear! The Choice Is Clear!



DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Amendment of the Commission's Rules)
Regarding Installment Payment Financing)
For Personal Communications Services (PCS))
Licensees)

WT Docket No. 97-82

REPLY COMMENTS TO OPPOSITION: FROM CELLNET OF OHIO, INC.

Cellnet of Ohio, Inc., a wireless reseller serving Ohio, takes this opportunity to respond to the mis-statements made by some commentators who oppose changing the Commission's ruling regarding C-block debt restructuring as it pertains to the availability of PCS service for resale.

As this Commission is well aware, PCS licensees, particularly the larger entities, have been less than responsive in offering their networks for resale, as required in the Commission's resale order. In fact , a national survey of wireless resellers done recently by the National Wireless Reseller's Association and submitted to the Commission last week in Docket 94-54 showed that only three of 46 resellers surveyed had secured resale agreements with PCS providers other than NextWave. The survey went on to say that more than 70 percent of inquires of wireless resellers attempting to secure agreements were rebuffed by the carriers.

Statements such as those made by AirGate that “certain PCS carriers have agreements in place to permit resale of their network services.” are misleading. First, AirGate fails to state to which PCS carriers it refers. Second, and most telling of all, AirGate fails to take the opportunity to tell of its resale plans as a “F Block” licensee. Will it permit the unrestricted resale of its services to those who request it? Or will it follow the lead of its larger PCS brethren such as AT&T, Sprint, Aerial, and Omnipoint and have no viable resale programs in place. AirGate fails to put its “money where its mouth is” and state for the record that it intends to offer resale programs such as those to which it refers in its comments.

The fact is, the only PCS carrier who has guaranteed favorable resale arrangements is NextWave. In fact, NextWave has gone a step further and offered fully-interconnected facility-based access to its networks to resellers who request it. No other PCS (or Cellular) carrier has made such an offer. This offer is not new, but rather was made before its financial problems came to light. Without NextWave and other C-Block licensees, and a strong commitment by the Commission to enforce its resale order, the small business sector will continue to be shut out of the “Wireless Revolution”.

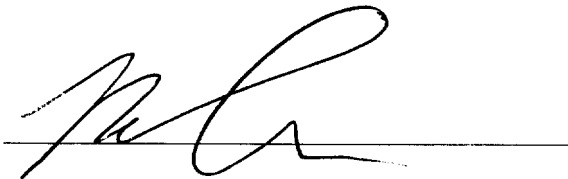
Conclusion

The C and F block auctions, for various reasons, have failed to put PCS licenses in the hands of women, minorities, and small businesses as was originally intended. Resale is the only viable option for these groups, but resale has been vehemently resisted by most PCS

providers, including those filing negative comments in this docket. We submit that those commentators can't have it both ways. Unrestricted resale of PCS service has been ordered by this Commission, but its orders have not been enforced and because of that, the resale of PCS service is virtually non-existent. The Commission must act decisively, and enforce its own orders and give realistic relief to those entities who embrace the minority and small business community. We urge the Commission to reconsider its previous order and work with C-block licensees to come up with a solution that works for all concerned.

Respectfully submitted:

CELLNET OF OHIO, INC.

A handwritten signature in black ink, appearing to read 'Michael Tricarichi', is written over a horizontal line.

Michael Tricarichi
President
Cellnet of Ohio, Inc.
23632 Mercantile Road
Cleveland, Ohio 44122

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of the Commission's Rules)	WT Docket No. 97-82
Regarding Installment Payment Financing)	
For Personal Communications Services (PCS))	
Licensees)	

CERTIFICATE OF SERVICE

I, Stephanie Savransky, hereby certify that I have, on this 8th day of January, 1998, served via the United Parcel Service, over-night priority mail, a copy of the attached "REPLY COMMENTS TO OPPOSITION: FROM CELLNET OF OHIO, INC." filed today to the following parties:

The Honorable William Kennard
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, DC 20554

The Honorable Harold Furchtgott-Roth
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, DC 20554

The Honorable Gloria Tristani
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, DC 20554

The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, DC 20554

The Honorable Michael Powell
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, DC 20554


Stephanie Savransky